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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	NO. CR-21-00453 SI
	)	[FILED AUGUST 20, 2021]
Plaintiff,	)	
	)	
v.	)	
	)	NOTICE OF RELATED CASE IN A CRIMINAL
BERNARD CURRAN,	)	ACTION
	)	
Defendant.	)	

UNITED STATES OF AMERICA,	)	NO. CR-23-0404 WHA
	)	[FILED NOVEMBER 2, 2023]
Plaintiff,	)	
	)	
v.	)	NOTICE OF RELATED CASE IN A CRIMINAL
	)	ACTION
	)	
CYRIL YU,	)	
	)	
Defendant.	)	

NOTICE OF RELATED CASES

1 UNITED STATES OF AMERICA,

2 Plaintiff,

3 v.

4 RODOLFO “RUDY” PADA,

5 Defendant.

) NO. CR-23-00403 SI  
) [FILED NOVEMBER 2, 2023]

) NOTICE OF RELATED CASE IN A CRIMINAL  
) ACTION

7 UNITED STATES OF AMERICA,

8 Plaintiff,

9 v.

10 REZA KHOSHNEVISAN,

11 Defendant.

) NO. CR-23-00420 JSC  
) [FILED NOVEMBER 9, 2023]

) NOTICE OF RELATED CASE IN A CRIMINAL  
) ACTION

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 BAHMAN GHASSEMZADEH,

17 Defendant.

) NO. CR-23-00418 VC  
) [FILED NOVEMBER 9, 2023]

) NOTICE OF RELATED CASE IN A CRIMINAL  
) ACTION

19 UNITED STATES OF AMERICA,

20 Plaintiff,

21 v.

22 SIAVASH “SIA” TAHBAZOF,

23 Defendant.

) NO. CR-23-00421 EMC  
) [FILED NOVEMBER 9, 2023]

) NOTICE OF RELATED CASE IN A CRIMINAL  
) ACTION

24  
25 The United States of America, pursuant to Local Criminal Rule 8-1, hereby notifies the Court  
26 that the three above-captioned criminal cases are related. Defendant Curran pled guilty in a public  
27 corruption case involving bribes paid to employees of the San Francisco Department of Building  
28 Inspection (hereinafter “DBI”), where Curran worked. Defendants Sia Tahbazof, Reza Khoshnevisan,  
NOTICE OF RELATED CASES

1 and Bahman Ghassemzadeh are all charged with participating in a conspiracy to pay bribes to DBI  
2 employees, including Curran. Additionally, defendants Cyril Yu and Rodolfo Pada are also former DBI  
3 employees, and are charged with participating in a conspiracy to accept bribes from Tahbazof,  
4 Khoshnevisan, and Ghassemzadeh.

5 Based on these facts, all of these cases are related within the meaning of Local Rule 8-1(b)(1)  
6 because they involve the same defendants and the same events and occurrences. Furthermore, the cases  
7 are related within the meaning of Local Rule 8-1(b)(2) because, if heard by separate judges, the actions  
8 likely would involve substantial duplication of labor by the two judges.

9 Per the requirement of Local Criminal Rule 8-1(c)(4), government counsel states that assignment  
10 of these cases to a single judge is likely to conserve judicial resources and promote an efficient  
11 determination of each action.

12  
13 DATED: November 27, 2023

Respectfully submitted,

14 MATTHEW M. YELOVICH  
15 Attorney for the United States

16 /s/ David J. Ward  
17 DAVID J. WARD  
18 Assistant United States Attorney  
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